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EXHIBIT

A

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet

| For Prothonotary Use Only (Docket Number) | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SEPTEMBER 2020 | 000104 |
| E-Filing Number: 2009011088 | |
| PLAINTIFF'S NAME MALIKAH GIVENS | DEFENDANT'S NAME TARGET CORPORATION, ALIAS: TARGET |
| PLAINTIFF'S ADDRESS 131 W. TULEPHOCKEN STREET 3RD FLOOR PHILADELPHIA PA 19144 | DEFENDANT'S ADDRESS 456 NORTH 5TH STREET PHILADELPHIA PA 19123 |
| PLAINTIFF'S NAME | DEFENDANT'S NAME TARGET |
| PLAINTIFF'S ADDRESS | DEFENDANT'S ADDRESS 456 NORTH 5TH STREET PHILADELPHIA PA 19123 |
| PLAINTIFF'S NAME | DEFENDANT'S NAME |
| PLAINTIFF'S ADDRESS | DEFENDANT'S ADDRESS |
| TOTAL NUMBER OF PLAINTIFFS 1 | TOTAL NUMBER OF DEFENDANTS 2 |
| COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions | |
| AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00 | COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input checked="" type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other: |
| CASE TYPE AND CODE 2S - PREMISES LIABILITY, SLIP/FALL | |
| STATUTORY BASIS FOR CAUSE OF ACTION | |
| RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER) | IS CASE SUBJECT TO COORDINATION ORDER? YES NO |
| FILED PRO PROTHY SEP 09 2020 A. SILIGRINI | |
| TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>MALIKAH GIVENS</u> Papers may be served at the address set forth below. | |
| NAME OF PLAINTIFFS/PETITIONERS/APPELLANT'S ATTORNEY ANDREW S. DASHEVSKY | ADDRESS DASHEVSKY HORWITZ KUHN & NOVELLO PC 1315 WALNUT ST 12TH FLOOR PHILADELPHIA PA 19107 |
| PHONE NUMBER (215) 546-4488 | FAX NUMBER (215) 732-6220 |
| SUPREME COURT IDENTIFICATION NO. 84206 | E-MAIL ADDRESS adashevsky@dashevskylaw.com |
| SIGNATURE OF FILING ATTORNEY OR PARTY ANDREW DASHEVSKY | DATE SUBMITTED Wednesday, September 09, 2020, 09:33 am |

FINAL COPY (Approved by the Prothonotary Clerk)

**DASHEVSKY, HORWITZ, KUHN,
NOVELLO & SHORR, P.C.**
By: Andrew S. Dashevsky, Esquire
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MAJOR NON JURY

Filed and Attested by the
Office of Judicial Records
09 SEP 2020 09:33 am



ATTORNEY FOR PLAINTIFF

MALIKAH GIVENS

vs.

**TARGET CORPORATION, Individually &
d/b/a TARGET
and
TARGET**

**COURT OF COMMON PLEAS
PHILADELPHIA COUNTY**

SEPTEMBER TERM, 2020

NO.:

NOTICE TO PLEAD

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

**PHILADELPHIA BAR ASSOCIATION
LAWYER REFERRAL AND INFORMATION SERVICE
One Reading Center
Philadelphia, PA 19107
Telephone: 215-238-1701**

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**ASOCIACION DE LICENCIADOS DE FILADELFA SERVICIO
DE REFERENCIA E INFORMACION LEGAL
One Reading Center
Filadelfia, Pennsylvania 19107
Teléfono: 215-238-1701**

Case ID: 200900104

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ATTORNEY FOR PLAINTIFF

MALIKAH GIVENS
131 West Tulephocken Street, 3rd Floor
Philadelphia, PA 19144

vs.

**TARGET CORPORATION, Individually &
d/b/a TARGET**
456 North 5th Street
Philadelphia, PA 19123
and
TARGET
456 North 5th Street
Philadelphia, PA 19123

**COURT OF COMMON PLEAS
PHILADELPHIA COUNTY**

SEPTEMBER TERM, 2020

NO.:

CIVIL ACTION COMPLAINT

1. Plaintiff, Malika Givens, is an adult individual who resides at 131 West Tulephocken Street, Philadelphia, PA 19144.
2. Defendant, Target Corporation, Individually & d/b/a Target, is a Pennsylvania Corporation and/or business entity with a principal place of business and/or office for process of service located at 456 North 5th Street, Philadelphia, PA 19123.
3. Defendant, Target, is a Pennsylvania Corporation and/or business entity with a principal place of business and/or office for process of service located at 456 North 5th Street, Philadelphia, PA 19123.
4. On or about July 18, 2019, and at all times relevant and material hereto, defendants, Target Corporation, Individually & d/b/a Target and Target, jointly and/or individually and/or through their joint and/or individually agents, servants, workmen and/or employees, owned, operated, occupied,

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leased, controlled and/or maintained the premises located at 456 North 5th Street, Philadelphia, PA 19123, more commonly known as "Target."

5. On or about July 18, 2019, and at all times relevant and material hereto, defendants, Target Corporation, Individually & d/b/a Target and Target, jointly and/or individually and/or through their joint and individual agents, servants, workmen and/or employees, had under their care, supervision and direction, control, custody and maintenance of the aforementioned premises, and said defendants were under a duty to maintain the said premises in a safe condition for the Plaintiff and other invitees proceeding thereon.

6. On or about the aforesaid date and at all times relevant and material herein, the defendants, Target Corporation, Individually & d/b/a Target and Target, jointly and/or individually and/or through their joint and individual agents, servants, workmen and/or employees, were under a legal duty to inspect the premises of the aforementioned Target, more particularly, the interior floors and aiseways, for purposes of detecting any defective and/or dangerous conditions upon the said property and premises, and insuring from the said dangerous and defective conditions the safe passage of the plaintiff and other business invitees lawfully proceeding thereon.

7. Notwithstanding this duty, defendants, Target Corporation, Individually & d/b/a Target and Target, jointly and/or individually and/or through their joint and/or individual agents, servants, workmen and/or employees, did on the date aforesaid and for sometime prior thereto, carelessly and negligently allow and permit dangerous and defective conditions to exist, including but not limited to: failing to clean and maintain the floor and aisleway of said business establishment of water, liquids and/or other slippery and/or foreign substances, as well as other dangerous conditions, all of which created a highly dangerous and defective condition for the plaintiff, Malikah Givens, who was a business invitee, and other invitees proceeding thereon.

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8. On or about July 18, 2019, while the plaintiff, Malikah Givens, was inside the aforesaid premises of Target located at 456 North 5th Street, Philadelphia, PA 19123, she was caused to slip and fall as a result of coming into contact with the aforementioned dangerous condition on the floor in the aisleway of said business establishment, causing her to sustain personal injuries hereinafter more specifically set forth.

9. Plaintiff avers that the defendants, Target Corporation, individually & d/b/a Target and Target, jointly and/or individually and/or through their joint and/or individual agents, servants, workmen and/or employees, had or should have had notice of the existence of said dangerous and defective conditions upon the premises aforementioned prior to this accident.

10. At the time and place aforesaid, the carelessness and negligence of the defendants, Target Corporation, Individually & d/b/a Target and Target, jointly and/or individually and/or through their joint and/or individual agents, servants, workers and/or employees, consisted of the following:

- a) Failing to properly maintain the said premises;
- b) Failing to clean said premises, floors and aisleways at reasonable intervals;
- c) Failing to give proper and sufficient warnings to plaintiff of the highly dangerous condition of said premises;
- d) Disregarding the rights and safety of the plaintiff and other persons lawfully on the defendants' premises;
- e) Allowing the premises, floors and aisleways to remain in a dangerous and unsafe condition;
- f) Allowing liquid/water substances to remain on the floor and aisleways of the interior premises so as to constitute a danger for persons lawfully on said premises;
- g) Failing to use reasonable prudence and care to keep the floors and aisleways in a safe condition;

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h) Failing to properly clean the floor and aiseways of water and other slippery substances;
i) Failing to instruct employees as to the proper maintenance of the floors and aiseways;
j) Failing to provide warnings or signs at or near the aforesaid area to avoid dangerous conditions for persons using the aforesaid property and premises;

k) Failing to have the premises, interior floors and aiseways of the store inspected at reasonable intervals in order to determine the condition of the aiseways and floors;

(l) Allowing their interior floor and aiseways of the store to be, become and remain slippery.

11. As a direct result of the defendants' carelessness and negligence as aforesaid, plaintiff, Malukah Givens, sustained internal and external injuries in and about the head, neck, shoulders, back, body and limbs, as well as various other injuries and conditions that may be established, all of which have caused her and will continue to cause her great pain and agony, and have prevented her and will continue to prevent her in the future from attending to her daily duties and occupation, all to her great financial damage and loss.

12. Further, by reason of the aforesaid, plaintiff, Malukah Givens, has been obliged to expend various sums of money for medicine and medical attention in and about endeavoring to treat and cure herself of her said injuries, and will be obliged to expend additional sums of money for the same purposes in the future, all to her great financial damage and loss.

13. As a further result of the accident and the injuries sustained therein, plaintiff, Malukah Givens, has and/or may suffer a severe loss of her earnings and impairment of his earning capacity and/or power, all of which has been and will continue to be to her great financial damage and loss.

14. Plaintiff, Malukah Givens, avers that her injuries and damages were caused solely by the negligence of the defendants, and all of them, as hereinbefore set forth.

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WHEREFORE, plaintiff, Malikah Givens, demands judgment against defendants, Target Corporation, Individually & d/b/a Target and Target, jointly and severally, for an amount in excess of Fifty Thousand (\$50,000.00) Dollars, plus interest and costs.

DASHEVSKY, HORWITZ, KUHN
NOVELLO & SHORR, P.C.

BY: 

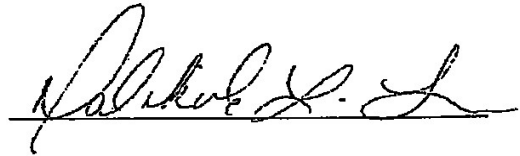
ANDREW S. DASHEVSKY, ESQUIRE
ATTORNEY FOR PLAINTIFF

Case ID: 200900104

DASHEVSKY, HORWITZ, KUHN, NOVELLO & SHORR, P.C.

VERIFICATION

I, Malika Givens, make this verification subject to the penalties of 18 Pa. C.S.A. §4904, relating to unsworn falsification to authorities. The attached pleading is based upon information which I have furnished to my counsel and information which has been gathered by my counsel in preparation for the prosecution of this lawsuit. The language contained in the pleading is that of counsel and not mine. I have read the pleading, and to the extent it is based upon information which I have given to my counsel, it is true and correct to the best of my knowledge, information, and belief. To the extent that the contents of the pleading are that of counsel, I have relied upon my counsel in making this verification.



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